

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

United States of America,

v.

07 Cr. 814 (JFK)

Rodolphe Nogbou,

Defendant.

CERTIFICATE OF SERVICE

I, Jared R. Jenkins, an attorney duly admitted to practice law before this Court, certify under penalty of perjury that on August 6, 2008, I caused to be served a true copy of Defense Counsel's Sentencing Memorandum on behalf of Rodolphe Nogbou, dated August 6, 2008, and the accompanying Exhibits, on the following attorney of record:

BY HAND

Mr. John P. Cronan
Assistant United States Attorney
United States Department of Justice
Southern District of New York
One Saint Andrew's Plaza
New York, New York 10007

Dated: August 6, 2008
New York, New York

By: /s/ Jared R. Jenkins